

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
Caption in Compliance with D.N.J. LBR 9004-2(c)	
<b>WASSERMAN, JURISTA &amp; STOLZ, P.C.</b>	
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<b>DANIEL M. STOLZ, ESQ. (DS-1897)</b>	
In Re:	Case No.: 10-44845
<b>WALSH SECURITIES, INC.,</b>	Hon. Novalyn L. Winfield
Debtor.	Chapter: 11

**NOTICE OF MOTION TO AUTHORIZE SUBMISSION  
OF RETENTION APPLICATION UNDER SEAL**

**PLEASE TAKE NOTICE** that on \_\_\_\_\_, 2010, at \_\_\_\_\_, or as soon thereafter as counsel may be heard, the undersigned attorneys for Walsh Securities, Inc., the Debtor in the within Chapter 11 proceeding, (“Debtor”) will appear before the Honorable Novalyn L. Winfield, United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102, and seek entry of an Order authorizing the Debtor to file an application for retention of special litigation counsel under seal and for a protective order regarding communications with special litigation counsel.

**PLEASE TAKE FURTHER NOTICE** that the undersigned will rely on the Application of Walsh Securities, Inc. submitted herewith. This motion does not involve complex questions of law, therefore no brief is required to be submitted pursuant to D.N.J. LBR 9013-2.

**PLEASE TAKE FURTHER NOTICE** that pursuant to D.N.J. LBR 9013-1, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, 50 Walnut Street, Newark,

New Jersey 07102, no later than seven (7) days prior to the initial return date of this motion. If no timely objection is filed and served, this motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief may be granted without a hearing.

**PLEASE TAKE FURTHER NOTICE** that pursuant to D.N.J. LBR 9013-1(f), unless a party requests oral argument and states their intentions regarding oral argument in their moving papers, or the court otherwise directs, this motion shall be decided on the papers. ORAL ARGUMENT IS WAIVED.

WASSERMAN, JURISTA & STOLZ, P.C.  
Attorneys for Walsh Securities, Inc., Debtor

/s/ Daniel M. Stolz  
By: \_\_\_\_\_  
DANIEL M. STOLZ

DATED: December 9, 2010.